

Douglas J. McNamara
(202) 408-4651
dmcnamara@cohenmilstein.com

November 15, 2017

VIA FEDERAL EXPRESS

Freedom of Information Act Officer
U.S. EPA Office of Pollution Prevention & Toxics
1200 Pennsylvania Avenue, NW
Mail Code 7401-M
Washington, D.C. 20460

Re: Re: Fayetteville Works industrial facility, located at 22828 NC Highway 87
W, Fayetteville, North Carolina, 28306 ("Fayetteville Works")

Dear Freedom of Information Act Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. 552, 40 CFR 2, Cohen Milstein Sellers & Toll PLLC is requesting to inspect or obtain copies of public records and information as described below. Cohen Milstein represents residents in New Hanover, Bladen, Brunswick, Cumberland, and Pender Counties in North Carolina that utilize water from the Cape Fear River for drinking and other household activities. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$10,000.

Please respond to this request as soon as possible. The residents need this information in order to implement various responsive measures to protect themselves from consuming perfluorinated and polyfluorinated substances, and time of the essence in protecting their human health. We agree to pay for the cost of expediting the agencies' response to this request. Please respond to this request as soon as information becomes available rather than waiting to complete the response to this request. If you expect a delay in responding to and fulfilling this request, please contact me with information about when I might expect copies or the ability to inspect the requested records. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

We request all Information related to chemicals manufactured, used or generated at the Fayetteville Works industrial facility, located at 22828 NC Highway 87 W, Fayetteville, North Carolina 28306 ("Fayetteville Works") or any other facility by the E. I. du Pont de Nemours and Company, Inc. ("DuPont") an/or The Chemours Company FC, LLC ("Chemours"), or any other facility owned or operated by these entities, or 3M Manufacturing Company, of the following polyfluorinated substances (collectively referred to as "PFAS" including but not limited to

perfluorooctanoic acids (“PFOAs”), perfluorooctane sulfonate (“PFOS”), perfluorocarboxylic acids (“PFCAs”), perfluorosulfonic acids (“PFSAs”) perfluoroalkyl ether carboxylic acids with one ether group (“mono-ether PFECAs”) and perfluoroalkyl ether carboxylic acids with multiple ether groups (“multi-ether PFECAs”), and Perfluoro-2-propoxypropanoic acid (“PFPrOPrA” also referred to as GenX), Nafion and Nafion by-products and wastes, and 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)-propanoic acid, the processing agent ammonium 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propanoate and the transformation product heptafluoropropyl 1,2,2,2-tetrafluorethyl ether, and perfluorisobutene, and all chemicals listed below:

Table S1. Perfluoroalkyl substances (PFASs) detected in the Cape Fear River (CFR) watershed

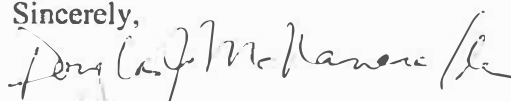
Compound	Molecular weight	Formula	CAS #	# of perfluorinated carbons	Chain length (including all C, O and S)
Perfluorocarboxylic acids (PFCAs)					
Perfluorobutanoic acid (PFBA)	214.0	C ₄ HF ₉ O ₂	375-22-4	3	4
Perfluoropentanoic acid (PFPeA)	264.0	C ₅ HF ₁₁ O ₂	2706-90-3	4	5
Perfluorohexanoic acid (PFHxA)	314.1	C ₆ HF ₁₃ O ₂	307-24-4	5	6
Perfluoroheptanoic acid (PFHpA)	364.1	C ₇ HF ₁₅ O ₂	375-85-9	6	7
Perfluorooctanoic acid (PFOA)	414.1	C ₈ HF ₁₇ O ₂	335-67-1	7	8
Perfluorononanoic acid (PFNA)	464.1	C ₉ HF ₁₉ O ₂	375-95-1	8	9
Perfluorodecanoic acid (PFDA)	514.1	C ₁₀ HF ₂₁ O ₂	335-70-2	9	10
Perfluorosulfonic acids (PFSAs)					
Perfluorobutane sulfonic acid (PFBS)	300.1	C ₄ HF ₉ SO ₃	375-73-5	4	5
Perfluorohexane sulfonic acid (PFHxS)	400.1	C ₆ HF ₁₃ SO ₃	355-16-4	6	7
Perfluorooctane sulfonic acid (PFOS)	500.1	C ₈ HF ₁₇ SO ₃	1763-23-1	8	9
Perfluoroalkyl ether carboxylic acids with one ether group (mono-ether PFECAs)					
Perfluoro-2-methoxyacetic acid (PFMOAA)	180.0	C ₄ HF ₉ O ₃	674-13-5	2	4
Perfluoro-3-methoxypropanoic acid (PFMOPrA)	230.0	C ₅ HF ₁₁ O ₃	377-73-1	3	5
Perfluoro-4-methoxybutanoic acid (PFMOBA)	280.0	C ₆ HF ₁₃ O ₃	863090-89-5	4	6
Perfluoro-2-propoxypropanoic acid (PFPrOPrA)	330.1	C ₇ HF ₁₅ O ₃	13252-13-6	5	7
Perfluoroalkyl ether carboxylic acids with multiple ether group (multi-ether PFECAs)					
Perfluoro(3,5-dioxaheptanoic) acid (PTO2HxA)	246.0	C ₄ HF ₉ O ₄	39492-88-1	3	6
Perfluoro(3,5,7-trioxaoctanoic) acid (PTO3OxA)	312.0	C ₅ HF ₁₁ O ₅	39492-89-2	4	8
Perfluoro(3,5,7,9-tetraoxadecanoic) acid (PTO4ODA)	378.1	C ₆ HF ₁₃ O ₆	39492-90-5	5	10

Page 3 of 12

Such information includes but is not limited to Significant New Use Rule notices and correspondence, Section 5(e) Consent Orders, submissions pursuant to Section 5(e) Consent Orders, laboratory testing or analysis conducted pursuant to Section 5(e) Consent Orders, Pre-manufacture Notices, including but not limited to correspondence, memoranda, notes, studies, comments, analysis, reports, and data, all prepared by Owners or U.S.EPA or any third party.

Thank you for considering my request.

Sincerely,



Douglas McNamara